# Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

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# Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

## Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 C.F.R. § 1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with reportable and targeted disabilities in the federal government.

 Using the goal of 12% as the benchmark, does your agency have a trigger involving <u>PWD</u> by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

a. Cluster GS-1 to GS-10 (PWD) Answer: No

b. Cluster GS-11 to SES (PWD) Answer: Yes

In FY 2017, there were 400 employees (10.88%) with disabilities in the GS-11 to SES cluster. This was 1.12% below the 12% benchmark.

- \* For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.
- 2. Using the goal of 2% as the benchmark, does your agency have a trigger involving <u>PWTD</u> by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

a. Cluster GS-1 to GS-10 (PWTD) Answer: No

b. Cluster GS-11 to SES (PWTD) Answer: No

There were no triggers involving PWTD by grade level cluster in the permanent workforce.

 Describe how the agency has communicated the numerical goals to the hiring managers and/or recruiters.

There is a direct line of communication between Human Resources (HR) and the Office of Civil Rights Diversity and Inclusion (OCRDI) by our establishment of the HR/OCRDI monthly meeting. The goals are communicated by OCRDI to HR staff, and HR includes the numericalgoals in the annual Outreach and Recruitment Plan. The Recruitment Plan is used to declare outreach and recruitment intentions for each special emphasis group. The Recruitment Plan is given to all hiring managers and recruiters, so that they are aware of APHIS' annual goals.

## Section II: Model Disability Program

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

# A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR DISABILITY PROGRAM

 Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If "no", describe the agency's plan to improve the staffing for the upcoming year.

Answer: Yes

The agency has designated sufficient qualified personnel to implement its disability program.

2. Identify all staff responsible for implementing the agency's disability employment program by the office, staff employment status, and responsible official.

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)	
	Full Time	Part Time	Collateral Duty	(,,,	
Processing applications from PWD and PWTD	9	0	0	Nancy Varichak, Deputy Director, HR Operations - HR Nancy.C.Varichak@aphis.usd a.gov	
Answering questions from the public about hiring authorities that take disability into account	1	0	1	Adrienne Burch, Management Analyst - OCRDI Adrienne.m.burch@aphis.usd a.gov	
				Thomas Mack, HR Specialist - HR Thomas.l.mack@aphis.usda.g ov	
Processing reasonable accommodation requests from applicants and employees	2	0	0	David Walton, RA Coordinator - HR david.walton@aphis.usda.gov  Carol Griffith, RA Specialist - HR Carol.a.griffith@aphis.usda.go	
Section 508 Compliance	0	0	1	Cindy Macleod-Sims - 508 Compliance Cindy.A.Macleod@aphis.usda	
Architectural Barriers Act Compliance	0	0	1	GSA	

Dischility Program Took		of FTE Staff by	Responsible Official	
Disability Program Task	Full Time	Part Time	Collateral Duty	(Name, Title, Office, Email)
Special Emphasis Program for PWD and PWTD	1	0	15	Adrienne Burch, Management Analyst - OCRDI Adrienne.m.burch@aphis.usd a.gov
				Thomas Mack, HR Specialist - HR Thomas.l.mack@aphis.usda.g

3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If "yes", describe the training(s) that disability program staff have received. If "no", describe the training(s) planned for the upcoming year.

Answer: Yes

APHIS' AgLearn training system provides Accessibility and Section 508 Awareness training and Disability Legislation & Reasonable Accommodation (A Practical Guide) training, Hidden Talent: How Leading Companies Hire, Retain, and Benefit from People with Disabilities,

Selective Placement Program Coordinator (SPPC) training, AbilityOne Program training, Perfectly Able: How to Attract and Hire Talented People with Disabilities, etc. Special Emphasis Program Managers (SEPMs) Training is mandatory for all SEPMs, including Disability Employment Program Managers.

# B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If "no", describe the agency's plan to ensure all aspects of the disability program have sufficient funding and other resources.

Answer: Yes

The agency provides sufficient funding and other resources to successfully implement the disability program.

## Section III: Program Deficiencies in the Disability Program

The agency has not reported any program deficiencies involving the disability program.

#### Section IV: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. § 1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency's recruitment program plan for PWD and PWTD.

#### A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES

 Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with targeted disabilities.

APHIS collaborates with Association of People Supporting Employment First (APSE) in order to perform outreach and recruitment efforts. We also use the Job Accommodation Network (JAN) database in order to recruit applicants with disabilities.

2. Pursuant to 29 C.F.R. § 1614.203(a)(3), describe the agency's use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce.

Many of the merit promotion announcements that the Animal and Plant Health Inspection Service (APHIS) posts state that applications will be accepted from individuals eligible for noncompetitive appointment. Targeted recruitment outside of USDAJOBS is also conducted to contact applicants with disabilities.

APHIS uses Schedule A 213.3102 (u) to hire individuals with physical, psychiatric, and/or intellectual disabilities. In addition, the authorities to make noncompetitive appointments of veterans with service-connected disabilities of 30 percent or more with the prospect of conversion to a permanent appointment are also frequently utilized to appoint persons with disabilities. A wide variety of positions at all grade levels in both the General Schedule and Federal Wage System are filled using these authorities.

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority and (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

If a Schedule A applicant applies to a vacancy announcement, an HR Staffing Specialist/Assistant reviews the PWD's application materials to determine qualifications and eligibility. If the applicant is deemed qualified and eligible via Schedule A, he/she is forwarded to the selecting official via a non-competitive list (certificate). If the Schedule A applicant is selected, the servicing HR specialist provides guidance to the selecting official on the Schedule A appointment process.

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If "yes", describe the type(s) of training and frequency. If "no", describe the agency's plan to provide this training.

Answer: Yes

Newly selected hiring managers, as a part of their training process, attend Fundamentals of Human Resource Management (FHRM) training. During FHRM training, special hiring authorities like Schedule A are discussed as a major topic area. FHRM training occurs six times a year. We also provide selecting officials with ad hoc trainings on topics like Schedule A and OPM's Bender List.

# B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

Describe the agency's efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

In FY 2017, APHIS collaborated with organizations such as Lighthouse for the Blind, Association of People Supporting Employment First, and Gallaudet University's sign language instructors. We maintain connections not only for employment reasons, but to teach basic communication skills to APHIS employees that will assist with communicating with other employees who may be vision or hearing impaired.

### C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

- 1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If "yes", please describe the triggers below.
  - a. New Hires for Permanent Workforce (PWD) Answer: No
  - b. New Hires for Permanent Workforce (PWTD) Answer: No

No triggers exist for PWD and PWTD among new hires in the permanent workforce.

- 2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below.
  - a. New Hires for MCO (PWD) Answer: No
  - b. New Hires for MCO (PWTD) Answer: No

#### Not Applicable

Qualified applicant pool data was not provided with Table B7; therefore, we are unable to use qualified applicant pool data as a benchmark.

- 3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified *internal* applicants for any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below.
  - a. Qualified Applicants for MCO (PWD) Answer: Yes
  - b. Qualified Applicants for MCO (PWTD)

    Answer: Yes

#### 0704 - Animal Health Technician

6.71% of the relevant applicant pool are PWD; however, none applied. 1.17% of the relevant applicant pool are PWTD; however, none applied.

- 4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below.
  - a. Promotions for MCO (PWD) Answer: Yes
  - b. Promotions for MCO (PWTD) Answer: Yes

0303 - Miscellaneous Clerk & Assistant

PWD were 5.78% of those who qualified; however, none were selected.

0486 – Wildlife Biology

PWD were 10.37% of those who qualified; however, none were selected.

## Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

#### A. ADVANCEMENT PROGRAM PLAN

Describe the agency's plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

PWD and PWTD are given the same opportunities to participate in career development programs that are afforded to all APHIS employees. APHIS will continue to provide individuals with disabilities assistive technology to utilize throughout the career development programs, as well as for day-to-day duties.

#### **B. CAREER DEVELOPMENT OPPORTUNITIES**

1. Please describe the career development opportunities that the agency provides to its employees.

The Basic Leadership Development Program (BLDP) targets employees at GS 4-6 levels to prepare participants with the essential knowledge, skills and abilities to meet the Agency's succession planning needs and to achieve excellence, regardless of position or grade level. This program is a blended learning program that supports one week of class room sessions and

weekly web based courses.

The Intermediate Leadership Development Program (ILDP) targets employees at GS 7-11 levels and consists of a blended learning curriculum, shadow assignments and learning team projects.

The Leadership Development for Project/Program Managers (LDPM) targets employees at GS 12-14 levels and consists of development of project and program management skills for those who lead teams.

The Advanced Leadership Development Program (ALDP) targets employees at GS 12-14 levels and consists of helping participants perform successfully in advanced supervisory and managerial level positions. The ALDP is filled via a competitive process open to full-time GS 12 - 14 employees in supervisory or managerial positions. No cohort was held in FY 2017.

The Federal Executive Institute (FEI) – Leadership for a Democratic Society targets employees at GS 15 level and Senior Executive Service level.

APHIS contracts with the Brookings Institute to deliver leadership development training to a diverse group of the Agency's high performing GS 14 level employees called the Brookings Executive Education (BEE) Program. Brookings offers a 9-month

#### interagency cohort-based

learning opportunity. Program highlights include an SES Application Package workshop to provide insights into the Executive hiring process. Program completion yields a Certificate of Public Leadership and an option to transfer program credit towards a Master's of Science in Leadership Degree granted by Olin Business School at Washington University in St. Louis.

In addition to the Brookings program, high performing APHIS GS 14 level employees are also sent to the Harvard Kennedy School- Senior Executive Fellow Program, a 4-week residential program that takes place on the University's Cambridge, MA campus. Participants receive

valuable training and practice in making decisions about real world challenges and scenarios. The Program curriculum includes Authentic Leadership, Decision Lab, Lexington Concord Leadership Tour, a Classroom Demo from an executive chef on the importance of healthy eating and wellness, and a lunch and learning opportunity with visiting Diplomats and Dignitaries. Participants receive a Certificate of Completion from Harvard and invitations to future alumni events.

2. Do triggers exist for <u>PWD</u> among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

a. Applicants (PWD) Answer: No

b. Selections (PWD) Answer: No

No data collected for FY 2017.

Will begin data collection in FY 2018.

3. Do triggers exist for <u>PWTD</u> among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

a. Applicants (PWTD) Answer: No

b. Selections (PWTD) Answer: No

No data collected for FY 2017.

#### C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If "yes", please describe the trigger(s) in the text box.

a. Awards, Bonuses, & Incentives (PWD) Answer: No

b. Awards, Bonuses, & Incentives (PWTD) Answer: No

Though the percentage of employees with disabilities who received a cash award is 11.47%, it is only 0.7% below the 12.17% inclusion rate benchmark; therefore, it is not a trigger.

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If "yes", please describe the trigger(s) in the text box.

a. Pay Increases (PWD) Answer: No

b. Pay Increases (PWTD) Answer: No

Though the percentage of employees with disabilities who received a quality step increase is 11.82%, it is only 0.35% below the 12.17% inclusion rate benchmark; therefore, it is not a trigger.

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If "yes", describe the employee recognition program and relevant data in the text box.

a. Other Types of Recognition (PWD)

Answer: N/A

b. Other Types of Recognition (PWTD)

Answer: N/A

Not Applicable.

The agency does not have other types of employee recognition programs.

#### D. PROMOTIONS

1. Does your agency have a trigger involving <u>PWD</u> among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

a. SES

i. Qualified Internal Applicants (PWD) Answer: No

ii. Internal Selections (PWD)

Answer: No

b. Grade GS-15

i.Qualified Internal Applicants (PWD) Answer: No

ii. Internal Selections (PWD)

Answer: Yes

c. Grade GS-14

i.Qualified Internal Applicants (PWD) Answer: No

ii. Internal Selections (PWD) Answer: No

d. Grade GS-13

i.Qualified Internal Applicants (PWD) Answer: No

ii. Internal Selections (PWD)

Answer: Yes

APHIS does not have data that specifies the GS levels for the positions that qualified internal applicants are applying towards. Therefore, APHIS is unable to use relevant applicant pool and qualified applicant pool as benchmarks. However, out of 83 employees promoted to GS-13 internally, only 9 were PWD (10.84%). Out of the 57 employees promoted to GS-14, 9 were PWD (15.79%). Out of the 13 employees promoted to GS-15

internally, none were PWD. Two APHIS employees were converted to SES, none of which have a disability.

(See chart in Part J)

- 2. Does your agency have a trigger involving <u>PWTD</u> among the qualified *internal* applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.
  - a. SES

i. Qualified Internal Applicants (PWTD) Answer: Yes

ii. Internal Selections (PWTD)

Answer: Yes

b. Grade GS-15

i.Qualified Internal Applicants (PWTD) Answer: Yes

ii. Internal Selections (PWTD) Answer: Yes

c. Grade GS-14

i.Qualified Internal Applicants (PWTD) Answer: Yes

ii. Internal Selections (PWTD)

Answer: Yes

d. Grade GS-13

i.Qualified Internal Applicants (PWTD) Answer: Yes

ii. Internal Selections (PWTD)

Answer: Yes

APHIS does not have data that specifies the GS levels for positions that qualified internal applicants are applying towards. Therefore, APHIS is unable to use relevant applicant pool and qualified applicant pool as benchmarks. However, based on the chart given in Section

IV.D.1, no PWTD were promoted to any senior grade levels.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWD</u> among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

a. New Hires to SES (PWD) Answer: Yes

b. New Hires to GS-15 (PWD)

Answer: Yes

c. New Hires to GS-14 (PWD) Answer: Yes

d. New Hires to GS-13 (PWD) Answer: No

APHIS does not have data that specifies the GS levels for new hire positions (Please see Table B7 in the Appendix). However, outside of Schedule A, only 5.11% of new hires to permanent positions were PWD. In regards to the GS-13 level, six out of the 31 new hires were PWD (19.35%). None of the GS-14 and GS-15 new hires were PWD.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWTD</u> among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

a. New Hires to SES (PWTD)

Answer: Yes
b. New Hires to GS-15 (PWTD)

Answer: Yes
c. New Hires to GS-14 (PWTD)

Answer: Yes
d. New Hires to GS-13 (PWTD)

Answer: No

APHIS does not have data that specifies the GS levels for new hire positions (Please see Table B7 in the Appendix). However, in regards to the GS-13 level, one out of the 31 new hires was a PWTD (3.22%). None of the GS-14 and GS-15 new hires were PWTD.

- 5. Does your agency have a trigger involving <u>PWD</u> among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.
  - a. Executives

i. Qualified Internal Applicants (PWD)

Answer: Yes

ii. Internal Selections (PWD)

Answer: Yes

b. Managers

i.Qualified Internal Applicants (PWD) Answer: Yes

ii. Internal Selections (PWD)

Answer: No

c. Supervisors

i.Qualified Internal Applicants (PWD) Answer: Yes

ii. Internal Selections (PWD)

Answer: No

APHIS does not have data that specifies the supervisory status of positions in which internal applicants are selected for promotion. However, in regards to GS-13, GS-14, and GS-15, please see the table in Section IV. D.5

- 6. Does your agency have a trigger involving <u>PWTD</u> among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.
  - a. Executives

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD)

Answer: Yes

b. Managers

i.Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD)

Answer: Yes

c. Supervisors

i.Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: Yes

APHIS does not have data that specifies the supervisory status of positions in which internal applicants are selected for promotion. However, in regards to GS-13, GS-14, and GS-15, please see the table the table in Section IV. D.6.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWD</u> among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.

a. New Hires for Executives (PWD)

Answer: No

b. New Hires for Managers (PWD)

Answer: No

c. New Hires for Supervisors (PWD) Answer: No

APHIS does not have data that specifies the supervisory status of positions for new hires nor qualified applicant pool data.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWTD</u> among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.

a. New Hires for Executives (PWTD) Answer: No

b. New Hires for Managers (PWTD)

Answer: No

c. New Hires for Supervisors (PWTD)

Answer: No

APHIS does not have data that specifies the supervisory status of positions for new hires nor qualified applicant pool data.

Section VI: Plan to Improve Retention of Persons with Disabilities

To be a model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace personal assistance services.

#### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

1. In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If "no", please explain why the agency did not convert all eligible Schedule A employees.

Answer: No

There are 3 employees that have not been converted – we are currently following up with the respective programs to address this issue.

 Using the inclusion rate as the benchmark, did the percentage of <u>PWD</u> among voluntary and involuntary separations exceed that of persons without disabilities? If "yes", describe the trigger below.

a. Voluntary Separations (PWD) Answer: No

b. Involuntary Separations (PWD)

Answer: No

There are no triggers in regards to voluntary and involuntary separations of PWD.

3. Using the inclusion rate as the benchmark, did the percentage of <u>PWTD</u> among voluntary and involuntary separations exceed that of persons without targeted disabilities? If "yes", describe the trigger below.

a. Voluntary Separations (PWTD) Answer: No

b. Involuntary Separations (PWTD)

Answer: No

There are no triggers in regards to voluntary and involuntary separations of PWTD.

4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

No trigger exists involving the separation rate of PWD and/or PWTD.

#### B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 C.F.R. § 1614.203(d)(4), federal agencies are required to inform job applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b)), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151 – 4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

1. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

APHIS' website is 508 compliant. However, although APHIS does not have a web page dedicated to 508 compliance, its website includes links to USDA's 508 website: https://www.aphis.usda.gov/aphis/ourfocus/business-services/Information\_Technology https://www.usda.gov/accessibility-statement

2. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.

APHIS' facilities are General Services Administration (GSA) owned or leased facilities; therefore, compliance with the Architectural Barriers Act is the responsibility of GSA.

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

APHIS has a collateral duty 508 program manager. Available funding does not exist for the program and thus nothing has been completed to date in this area. To support this program in greater detail APHIS plans to:

- Begin program training staff to ensure 508 compliance is understood. The suggestion has been made to create an Aglearn training program and require it annually.
  - Train all IT support staff to support users using assistive technology.
- Perform a health check on our public and internal websites to determine compliance with applicable laws.
- Collaborate with enterprise software manufactures to obtain understanding and training in 508 compliance with their software. For example: Contact Microsoft to obtain training and user guides for Word, Excel, etc., for 508 compliance.

#### C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

 Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

The average processing time is approximately 25 days. It's important to understand that the processing timeframe depends upon how quickly the employee or requester provides the requested medical information.

2. Describe the effectiveness of the policies, procedures, or practices to implement the agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

Make reasonable accommodations and Work Life Wellness (WLW) information available to disabled veteran applicants during the recruitment process. Through WLW, veterans have access to WorkLife4You, an agency-paid benefit which offers counseling.

APHIS manages a comprehensive Reasonable Accommodation (RA) program and maintains an informative website:

http://www.aphis.usda.gov/mrpbs/hr/reasonable\_accommodation.shtml. The site includes a link to the MRP Reasonable Accommodation Departmental Directive and provides other information and resources. Marketing and Regulatory Programs Business Services (MRPBS), which includes APHIS, has a full-time Reasonable Accommodation Program Coordinator and a full-time Reasonable Accommodation Specialist for handling requests for accommodations.

During the last fiscal year, the RA staff delivered seven workshops, including five overview presentations detailing the accommodation process and two webinars focusing on telework as an accommodation. The RA staff trained eight members of the IES staff on March 1, 2017. The two telework webinars took place on May 8, 2017, with 54 employees attending, and on July 12, 2017, with 63 employees attending. In FY 2017, the RA staff began participating in the Federal Human Resources Management Training (FHRM). The RA staff participated in four FHRM trainings, along with representatives of the Office of Civil Rights, Diversity, and Inclusion, on June 21, 2017, at which 30 participants were trained; July 25, 2017, at which 25 people received training; August 22, 2017, at which 25 people received training; and September 12, 2017, at which 25 attendees received training.

APHIS ensures reasonable accommodations are being made to qualified individuals with disabilities in accordance to applicable laws and departmental regulations.

- All requests for reasonable accommodations are forwarded to the agency Reasonable Accommodations program staff for review and processing in accordance with applicable laws and departmental regulations.
- The Reasonable Accommodations staff and the TARGET Center often work together to coordinate accommodations solutions. The staff collaborates with ITD to obtain the support needed for the assistive technology and assistive software used as

reasonable accommodations.

- The MRP Reasonable Accommodation policy is administered as appropriate to process requests for reassignments as a reasonable accommodation.
- During FY 2017, the Reasonable Accommodation program opened 150 cases. Of that number 121 were closed within the fiscal year. (See table for breakdown of accommodations by program area.)
- The 2017 fiscal year was the first year in which the Reasonable Accommodation program's centralized accommodation fund, authorized by the APHIS Administrator, was in operation for the entire fiscal year.
- During this year, there were 58 requests for technology items which were purchased using the centralized accommodation fund. The total cost for funding these requests was \$19,795. The cost of providing interpreting services for APHIS employees who are deaf was \$200,257. The fact that the APHIS Reasonable Accommodation program has the resources to fund the cost of interpreting reduces a significant barrier to employment for deaf employees who work in APHIS.

FY2017 Cases by Program

MRPBS - 30

AC - 5

**BRS - 4** 

**IS** - 2

**LPA - 2** 

OA - 2

**PPD - 5** 

PPQ - 56

**VS - 38** 

WS - 6

Total - 150

APHIS FY 2017 RA Cases - Type of Accommodation Granted

Telework - 53

Modify Job Duties - 10

Office Equipment - 50

Special Software - 8

Other - 29

Total - 150

## D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE

Pursuant to 29 C.F.R. § 1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

APHIS' Employee Assistance Program (EAP) is extremely effective. The EAP counselors are available to our employee's on a 24 hour per day and 7 day per week basis. Employees receive a call back within 24 to 48 hours of contacting EAP except in instances of emergency. The EAP also provides a large variety of presentations to

our supervisors, managers and employees. We host at least 4 webinars from our headquarters location annually and presentations are always available at our other APHIS worksites upon request. APHIS also receives quarterly and annual return on investment reports which detail employee usage in all areas of the EAP.

## Section VII: EEO Complaint and Findings Data

#### A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the government-wide average?

Answer: No

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Answer: No

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

APHIS did not find any discrimination alleging harassment based on disability status during FY 2017.

# B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

 During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?

Answer: No

2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?

Answer: No

3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

APHIS did not find any discrimination alleging harassment based on disability status during FY 2017.

Section VIII: Identification and Removal of Barriers

Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Answer: Yes

2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?

Answer: Yes

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments.

Trigger 1	<ul> <li>APHIS does not meet the 12% goal of PWD and PWTD in the GS-11 – SES cluster.</li> <li>With MCO – Animal Health Technician (0704) PWD and PWTD are not applying for the position, though the relevant applicant pool for PWD is 6.71% and 1.17% for PWTD.</li> <li>PWD and PWTD were not selected for MCO – Miscellaneous Clerk &amp; Assistant (0303) and Wildlife Biology (0486) though PWD and PWTD make up a percentage of those who qualified.</li> </ul>			
Barrier(s)				
Objective(s)	Improve the advancement abilities for PWD and PWTD.			
Responsible Official(s)		3)	Performance Standards Address the Plan? (Yes or No)	
Adrienne Burch	Adrienne Burch		Yes	
Barrier Analysis Process Completed? (Yes or No)		npleted?	Barrier(s) Identified? (Yes or No)	
	Yes		Yes	
Source	es of Data	Sources Reviewed? (Yes or No)	Identify Information Collected	
			Data derived from the National Finance	
Workforce Data	a Tables	Yes	Center	
Complaint Data	a (Trends)	No		
Grievance Data (Trends) No		No		
EEO, Grievano Harassment Pr	ocesses)	No		
Climate Assess FEVS)	sment Survey (e.g.,	Yes		
Exit Interview D	Data	No		

Sources of Data		Sources Reviewed? (Yes or No)	Identify	Information C	ollected
Focus Groups		No			
Interviews		No			
Reports (e.g., C	Congress, EEOC, PPM)	No			
Other (Please D	<del>, '</del>	No			
Target Date (mm/dd/yyyy)	Planned Activities		Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2018	Communicate retention strategies to managers, supervisors and EEO collateral duty officials.		Yes		
09/30/2018	Maintenance of the Disability Employment Programs which are designed to promote employment, advancement, development, and retention of veterans.		Yes		
09/30/2018	Promote assistive technology for PWD and PWTD, and train information technology staff on ways to implement them.		Yes		
09/30/2018	Promote career development programs towards PWD/PWTD. Collect data on PWD and PWTD who apply for career development programs, qualification, and selection.		Yes		
09/30/2018	Increase disability employment program managers' communication with managers and supervisors through the use of conference calls, newsletters and email.		Yes		
09/30/2018	Require annual reasonable accommodation procedures and sensitivity training to managers and supervisors to alleviate the separation of PWD due to the lack of resources or knowledge.		Yes		
Fiscal Year	Accomplishments				
2017	Partnered with emp	loyees who are	veterans with d	isabilities and no	n-veterans with
2017	Updated and maintained contacts with vocational rehabilitation offices, state				

4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

#### Not Applicable.

5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

APHIS provided agency-sponsored programs designed to educate managers, supervisors and human resource managers on ways to use the Schedule A hiring authority to recruit and hire talented PWD. Employees of the agency worked with APHIS hiring officials to first consider applicants under the special hiring authorities. This means considering qualified PWD and veterans in filling critical vacancies. APHIS has established a new form for new hires which requests the official to document which special hiring options have been considered.

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

Not	App	lical	ole
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